Appendix A
Proposed Rule Changes
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Progeny LMS, LLC
Reply Comments
RM-10403
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Spectrum Cap

90.353(d)
Existing language:
"Except as provided in paragraph (f) of this section, multilateration EA licensees may be authorized to operate on only one of the three multilateration bands within a given EA."

Progeny proposal: Delete this language, allowing a single multilateral LMS licensee to operate in all three multilateration bands within a given EA.

90.353 (f)
Existing language:
"Multilateration EA licensees may be authorized to operate on both the 919.75-921.75 MHz and 921.75-927.75 MHz bands within a given EA (see §90.209(b)(10)."

Progeny proposal: Delete this section, in keeping with the above change.

Service Restrictions

90.351
Existing language:
"LMS systems utilize non-voice radio techniques to determine the location and status of mobile radio units. LMS licensees authorized to operate a system in the 902-928 MHz band may serve individuals, federal government agencies, and entities eligible for licensing in this part 90."

Progeny proposal: Delete existing language and replace with:

"LMS systems primarily utilize non-voice radio techniques to locate and monitor mobile units but may also provide ancillary voice and data services to mobile and fixed locations. LMS systems are unrestricted in the entities they may serve."

90.353(b)
Existing language:
"LMS systems are authorized to transmit status and instructional messages, either voice or non-voice, so long as they are related to the location or monitoring functions of the system."

Progeny proposal: Delete existing language and replace it with:
"LMS systems are authorized to transmit voice and data traffic as part of the location and monitoring services."

Real-Time Interconnection

90.353(c)
Existing language:
"LMS systems may utilize store and forward interconnection, where either transmissions from a vehicle or object being monitored are stored by the LMS provider for later transmission over the public switched telephone network (PSN), or transmissions received by the LMS provider from the PSN are stored for later transmission to the vehicle or object being monitored. Real-time interconnection between vehicles or objects being monitored and the PSN will only be permitted to enable emergency communications related to a vehicle or a passenger in a vehicle. Such real-time, interconnected communications may only be sent to or received from a system dispatch point or entities eligible in the Public Safety or Special Emergency Radio Services. See subparts B and C of this part."

Progeny proposal: Either delete the provision or, alternatively, delete it and replace it with the following language:
"LMS systems may provide real-time voice or data communications through interconnection with the public switched telephone network (PSTN) or other networks as part of the Location and Monitoring Service.

90.353(g)
Existing language:
"Multilateration LMS systems whose primary operations involve the provision of vehicle location services, may provide non-vehicular location services".

Progeny proposal: Delete existing language and replace it with:
"Multilateration LMS systems may provide vehicular or non-vehicular location and monitoring services."

Interference and Safe Harbor

90.353(d)
Existing language:
"Additionally, EA multilateration LMS licenses will be conditioned upon the licensee's ability to demonstrate through actual field tests that their systems do not cause unacceptable levels of interference to 47 CFR part 15 devices."

Progeny proposal: Delete existing language and replace with the following:
"Multilateration LMS licensees will cooperate with other users of the 902-928 MHz band to mitigate interference between systems. LMS systems will utilize reasonable interference mitigation techniques where necessary to promote band sharing with existing Part 15 and Part 97 users of the band."

90.361

Progeny proposal: Append the following proposed language:

"In the event that operations under Part 15 cause harmful interference to LMS systems in the 902-928 MHz band, the manufacturers of the interfering devices, or where appropriate, the operators of systems or networks that employ such devices, shall cooperate with LMS licensees to mitigate such interference. The manufacturers or system operators will utilize reasonable mitigation techniques where necessary to promote band sharing with LMS systems."

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